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ATTACHMENT A

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Michael J. Barrett, being duly sworn, hereby depose and state as follows:

1. I am a Postal Inspector employed with the United States Postal Inspection Service (USPIS) since 2022. I am currently assigned to the Roanoke, VA domicile of the Washington Division. My responsibilities include the investigation of federal and state criminal violations involving the United States Postal Service (USPS) and crimes furthered through the use of the United States Mail. I am a “Federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a search warrant. I am authorized to investigate criminal and civil matters related to the United States Postal Service and the mails; serve warrants and subpoenas; make arrests; carry firearms; make seizures of property; administer oaths; and perform such other official duties as may be established by the Chief Postal Inspector.

2. Prior to becoming a United States Postal Inspector, I was a Police Officer with Fairfax County for four (4) years. I attended and completed a six (6) month academy, conducted at the Fairfax County Criminal Justice Academy. During my time as a police officer, I was trained in criminal investigations with regards to assaults, narcotics, violent crimes, as well as other law enforcement duties.

3. I know based on training and experience that the U.S. Mail is often used by drug trafficking organizations to transport controlled substances and proceeds from the sale of

controlled substances. I know based on training and experience that USPS Priority Mail and Priority Mail Express are commonly used to transport controlled substances, and drug trafficking proceeds, because drug traffickers can track parcels, control dispatch times and locations, and have a guarantee of delivery in one to three days.

PROBABLE CAUSE

4. This affidavit is submitted in support of an application for a search warrant of a USPS Priority Mail parcel bearing tracking number “9505 5131 8747 3082 1691 81” for controlled substances and/or the proceeds from drug trafficking. The parcel (hereafter referred to as Parcel #1) is described as follows:

- a. Addressee: Calae Nelson, 192 Switch Yard Ln, Gate City, VA 24251
- b. Return Address: Leo Gonzalez, 12384 Ave 416, Orosi, CA 93647
- c. Origin: Orosi, CA, 93647, Postage: \$29.35, Date: Mar 23, 2023
- d. Tracking Number: 9505 5131 8747 3082 1691 81 (Parcel #1)
- e. Description: White USPS Priority Mail box bearing dimensions 12.25” x 12” x 8.5”
- f. Weight: 4 pound 2.50 ounces

5. On March 24, 2023, Parcel #1 was identified as a suspected drug parcel inbound to the Western District of Virginia. Parcel #1 was mailed from the Orosi, CA, 93647 Post Office on March 23, 2023. Continuing March 29, 2023, your affiant took custody of Parcel #1. Parcel #1 is a white USPS Priority Mail box bearing a USPS Priority Mail handwritten label. California is a known source area for parcels containing controlled substances mailed into the Western District of Virginia. A photograph of Parcel #1 is attached as Exhibit #1.

6. Your affiant made inquiries via postal databases and CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information. The sender's name of "Leo Gonzalez" was not associated to 12384 Ave 416, Oroshi, CA 93647. A search of CLEAR indicated the recipient "Calaeb Nelson" does not reside at 192 Switch Yard Ln, Gate City, VA 24251. A search of postal business records indicated that a person named "S.F." has received prior parcels at 192 Switch Yard Ln, Gate City, VA 24251. In your affiant's training and experience, drug trafficking organizations utilize different sender address and name information when sending parcels containing controlled substances and/or drug proceeds through the U.S. Mail.

7. On March 29, 2023, your affiant requested a narcotic detection canine from the Virginia State Police. Trooper J.C. Kirkland, and his narcotic detection canine, "Bruin," responded to the USPS Roanoke Processing and Distribution Center located at 419 Rutherford Avenue NE, Roanoke, Virginia 24022. Parcel #1 was placed in a blind parcel line-up and subjected to an exterior search by Canine "Bruin." Trooper Kirkland advised your affiant at approximately 10:50 a.m. that Canine "Bruin" alerted to Parcel #1. According to Trooper Kirkland, this positive alert meant Canine "Bruin" detected the odor of an illegal drug emanating from Parcel #1. A supporting affidavit of the narcotics detection training completed by Trooper Kirkland and Canine "Bruin" is provided as Exhibit #2.

8. Based on the facts set forth in this affidavit, I respectfully submit that probable cause exists to believe that the USPS Priority Mail parcel bearing tracking number "9505 5131 8747 3082 1691 81" addressed to "Calaeb Nelson, 192 Switch Yard Ln, Gate City, VA 24251," bearing a return address of "Leo Gonzalez, 12384 Ave 416, Oroshi, CA 93647," contains controlled

substances, and/or the proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Michael J. Barrett

Michael J. Barrett
Postal Inspector
United States Postal Inspection Service

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by reliable electronic means; specifically, by telephone, on the 29th day of March, 2023.

Robert S. Ballou

The Honorable Robert S. Ballou
United States District Court Judge
Western District of Virginia